

Mr. Ray Darmer  
Johns Manville International  
1215 West Dewey Street  
Bremen, IN 46506

Re: 099-12050  
First Administrative Amendment to  
FESOP 099-8546-00042

Dear Mr. Ray Darmer:

Johns Manville International was issued a permit on June 15, 1999 for a rigid polyisocyanurate foam panel manufacturing plant. A letter requesting the removal of Condition C.17, Emission Statement, was received on March 17, 2000. The source's limited potential to emit of all criteria pollutants is less than 100 tons per year, therefore the requirements of 326 IAC 2-6 (Emission Reporting) do not apply. Even though the OAM recognized that 326 IAC 2-6 does not apply to the source in the original FESOP's technical support document, the OAM inadvertently left Condition C.17 in the original FESOP. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

1. Condition C.17, Emission Statement listed on page 23 of 34, is removed from the FESOP because 326 IAC 2-6 (Emission Reporting) does not apply to the source since the limited potential to emit of all criteria pollutants is less than 100 tons per year. The conditions following Condition C.17 are renumbered accordingly.
2. The table of contents is revised to reflect the removal of Condition C.17.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, at (800) 451-6027, press 0 and ask for (reviewers name) or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

NLJ

cc: File - Marshall County  
U.S. EPA, Region V  
Marshall County Health Department  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Johns Manville International  
1215 West Dewey Street  
Bremen, Indiana 46506**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 099-8546-00042	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 15, 1999
First Administrative Amendment: F-099-12050	Pages Affected: 3, 23-25
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge Specifications

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]  
[326 IAC 2-8-5] [326 IAC 1-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

- C.17 Monitoring Data Availability
- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS - Cutting process**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.1 Particulate Matter (PM) [326 IAC 6-3]
- D.1.2 PM<sub>10</sub> [326 IAC 2-8-4]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.1.5 Particulate Matter (PM)
- D.1.6 Visible Emissions Notations
- D.1.7 Parametric Monitoring
- D.1.8 Broken Bag or Failure Detection

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.1.9 Record Keeping Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS - Insignificant Activities**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Volatile Organic Compounds (VOC)
- D.2.2 Volatile Organic Compounds (VOC)

**Certification Form**

**Emergency/Deviation Form**

**Semi-Annual Compliance Monitoring Report Form**

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.17 Monitoring Data Availability**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

#### **C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and

- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- (d) All storage containers containing ozone depleting substances identified in 40 CFR 82.102 (a) or (b), unless otherwise exempted, shall bear warning labels pursuant to 40 CFR 82.106. Pursuant to 40 CFR 82.108, these labels shall be clearly legible and conspicuous.